

REMARKS

The claims have been amended without adding new matter in order to correct minor informalities and to address other issues raised by the Examiner.

Claims 8-10 and 15 have been canceled without regard to prejudice or disclaimer.

The following claims remain pending in the application: Claims 1-7, and 11-21.

Reconsideration of the claims in view of the amendments above and remarks below is respectfully requested.

By way of this amendment, Applicant have made a diligent effort to place the claims in condition for allowance. However, should there remain any outstanding issues that require adverse action, it is respectfully requested that the Examiner telephone the undersigned at (602) 262-5355 so that such issues may be resolved as expeditiously as possible.

Claim Rejections - 35 U.S.C. §102

1. Claims 1-3, 5-6 and 18-21 stand rejected under 35 U.S.C. § 102(e), as being anticipated by U.S. Patent Application Publication No. 2003/0174823 A1 (Justice et al.). The Applicants respectfully traverse.

Claims 1-3

The Applicant respectfully submits that every element of Claim 1 is not anticipated, disclosed, or taught by the Justice reference. The Office Action states, for instance, that Justice discloses the step of “obtaining identity information relating to an identity of a customer who purchases a financial transaction.” For example, in Figure 2 of Justice, a *card* number is disclosed, which is unique to a calling card but is not the “identity of a customer.” Figure 4 of Justice receives only a “payment account designator,” not the “identity of a customer.” Figure 9 only discloses “verifying” a customer name, address and phone number, not obtaining the information, as disclosed in claim 1. Paragraph [0004] is directed to inspecting a person for

physical appearance, and paragraph [0057] does not disclose obtaining identity information of a customer who purchases a *financial transaction*.

Regarding the step of comparing said financial transaction with zero or more previous financial transactions that occurred on a same day as said transaction and that comprise said identity information, none of the cited locations in Justice disclose previous *financial transactions* nor are the transactions disclosed to comprising said identity information. Justice only vaguely addresses transactions, but not limited to those transactions comprising said identity information or directed to *financial transactions*.

Additionally the step of generating a report that comprises said identification information and said additional information is not taught, disclosed, anticipated by Justice, as paragraphs [0121] discloses only that “reports are generated listing all detected past transactions containing the identified fraud indicator” and paragraph [0122] only discusses that a clerk is reading a report, not generating one: “The fraud clerk may use his or her judgment when scanning the reports...”

As Justice fails to disclose or teach every element of Applicant’s Claim 1, the rejection under §102(c) has been overcome, and Claim 1 is in condition for allowance. And by virtue of their dependence on an allowable base claim, dependent claims 2-3 are also in condition for allowance, and further as to Claim 3, nowhere does the specification mention a threshold amount of \$3,000.00.

Claims 5-6

Regarding the step of storing daily transactions for financial transactions in a database, Justice does disclose a database for storing past transactions, but does not teach storing *daily transactions for financial transactions* in the database ([0009]). Likewise, paragraph [0028] refers to storing call information in an account database, and does not teach storing *daily transactions for financial transactions* in the database. Paragraph [0032] teaches only updating the balance of a user account (but not storing daily financial transactions) and while paragraph

[0035] recites a database, nowhere is it disclosed that into this database, daily transactions for financial transactions are stored.

Also, the step of aggregating records by customer identifying information is not disclosed or taught by Justice. Figure 9 discloses retrieving orders and verifying certain information, but does not teach aggregation of records by customer identifying information, nor does paragraph [0016] as mentioned by the Office Action.

Further, regarding the step of storing said second record for reporting; as mentioned above, paragraphs [0121] discloses only that “reports are generated listing all detected past transactions containing the identified fraud indicator” and paragraph [0122] only discusses that a clerk is reading a report, not generating one: “The fraud clerk may use his or her judgment when scanning the reports...”. Further nowhere does Justice teach “reporting said second record to a controlling entity.”

As Justice fails to disclose or teach every element of Applicant’s Claim 5, the rejection under §102(c) has been overcome, and Claim 5 is in condition for allowance. And by virtue of its dependence on an allowable base claim, dependent claim 5 is also in condition for allowance and further as to Claim 5, nowhere does the Justice specification mention a threshold amount of \$10,000.00.

Claims 18-19

Regarding Claim 18 Justice fails to teach or disclose analyzing sales data to detect whether financial transactions have been purchased in a manner indicating a plurality of consecutive high-value purchases that exceed a threshold value. In the reference cited in the Office Action, figure 7 only discloses monthly, weekly, same day, or consecutive day ordering comparisons, not testing whether *consecutive high value purchases* had met some criterion or threshold. As Justice fails to disclose or teach every element of Applicant’s Claim 18, the rejection under §102(c) has been overcome, and Claim 18 is in condition for allowance. And by virtue of its dependence on an allowable base claim, dependent Claim 19 is also in condition for

allowance; and further as to Claim 19, nowhere does the Justice specification mention a threshold amount of \$2,000.00, including the referenced paragraph [0119].

Claims 20-21

Regarding Claim 20, Justice fails to teach or disclose the step of determining whether said transaction matches said plurality of transactions based on a match of a sender's name and zip code. Figure 9, as referred to in the Office Action, looks only for a match whether an order retrieved from a fraud queue with the customer's address. Claim 20, on the other hand discloses checking the sender's name and *zip code* against a *plurality* of transactions.

Further, Justice does not teach the step of advising a sales associate and disabling said transaction if a result of said summing step exceeds a dollar threshold. The referenced figure 4 in Justice discloses no step of advising a sales associate (the closest it comes is canceling an order) and paragraph [119] referenced in the Office Action is silent as to either advising a sales associate or disabling a transaction.

As Justice fails to disclose or teach every element of Applicant's Claim 20, the rejection under §102(e) has been overcome, and Claim 20 is in condition for allowance. And by virtue of its dependence on an allowable base claim, dependent Claim 21 is also in condition for allowance; and further as to Claim 21, nowhere does the Justice specification mention a threshold amount of \$2,000.00, including the referenced paragraph [0119].

Claim Rejections - 35 U.S.C. §103

2. Claim 4 stands rejected under 35 U.S.C. § 103(a), as being unpatentable over U.S. Patent Application Publication No. 2003/0174823 A1 (Justice et al.), in view of U.S.

Patent Application Publication No. 2002/0023057 A1 (Godwin et al.). The Applicants respectfully traverse.

Regarding Claim 4, the Applicants incorporate the arguments above in regards to independent Claim 1 on which Claim 4 depends, namely that every element of Claim 1 is not anticipated, disclosed, or taught by the Justice reference. Further as to the Godwin reference at paragraph [0207], the Applicants respectfully disagree that the reference teaches form 8105-A, and nowhere in the Godwin reference is form 8105 mentioned. Further Godwin's paragraph [0207] refers to figure 30, which is merely a computer screen for input dialog, and paragraph [0207] is directed to completing that online dialog. The mention of a USPS form is oriented at directing the user to fill out a USPS form, not generating a report as described in Claim 1 or form 8105-A as recited in Claim 4.

As neither Justice nor Goodwin, alone or in combination, suggest, teach, or disclose the Applicants' claim 4, the rejection under §103(a) has been overcome, and the Applicants respectfully assert that claim 4 is in condition for allowance.

3. Claim 7 stands rejected under 35 U.S.C. § 103(a), as being unpatentable over U.S. Patent Application Publication No. 2003/0174823 A1 (Justice et al.), in view of U.S. Patent Application Publication No. 2002/00138417 A1 (Lawrence). The Applicants respectfully traverse.

Regarding Claim 7, the Applicants incorporate the arguments above in regards to independent Claim 5 on which Claim 7 depends, namely that every element of Claim 5 is not anticipated, disclosed, or taught by the Justice reference. Further as to the Lawrence reference at paragraph [0004], nowhere does the cited reference disclose reporting a second record (of all records from said summing step) to the United States Treasury. Paragraph [0004] refers, instead, of the general obligations imposed by the Treasury Department as part of the Bank Security Act.

As neither Justice nor Lawrence, alone or in combination, suggest, teach, or disclose the Applicants' claim 7, the rejection under §103(a) has been overcome, and the Applicants respectfully assert that claim 7 is in condition for allowance.

4 Claim 8 stands rejected under 35 U.S.C. § 103(a), as being unpatentable over U.S. Patent Application Publication No. 2003/0033228 A1 (Bosworth-Davis et al.), in view of U.S. Patent Application Publication No. 2004/0133516 A1 (Buchanam et al.). The Applicants have cancelled Claim 8 without regard to prejudice or disclaimer.

5. Claims 9 and 10 stand rejected under 35 U.S.C. § 103(a), as being unpatentable over U.S. Patent Application Publication No. 2003/0033228 A1 (Bosworth-Davis et al.), in view of U.S. Patent Application Publication No. 2004/0133516 A1 (Buchanam et al.). The Applicants have cancelled Claims 9 and 10 without regard to prejudice or disclaimer.

6. Claims 11-14, and 16-17 stand rejected under 35 U.S.C. § 103(a), as being unpatentable over U.S. Patent Application Publication No. 2003/0174823 A1 (Justice et al.), in view of U.S. Patent Application Publication No. 2004/0133516 A1 (Buchanan et al.). The Applicants respectfully traverse.

Claims 11-14

Regarding Claim 11, Justice fails to teach examining digitized images of transactions in a plurality of workstations. Nowhere in Justice do the words "digitized," or "images," or "money laundering" occur, and figures 4, 5, 6 and 9 only disclose a method for the analysis and

weighting of fraud indicators, not a plurality of workstations, and not examination of digitized images. Further paragraph [0084] discusses whether a risk level of a transaction exceeds a threshold, not examining digitized images or determining whether money laundering occurs. The Buchanan reference is identified by the Office Action as disclosing examining digitized images of transactions in a plurality of workstations. While figure 1 discloses check capture, it does not disclose examination of images, nor does it disclose a plurality of workstations. Buchanan figure 4 does show check image document storage, but does not disclose a plurality of workstations reviewing digitized images. Likewise paragraph [0240] discloses only review of files by “a third party” not digitized images by a *plurality* of workstations.

As neither Justice nor Buchanan, alone or in combination, suggest, teach, or disclose the Applicants’ claim 11, the rejection under §103(a) has been overcome, and the Applicants respectfully assert that claim 11 is in condition for allowance.

In regards to Claims 12 and 13, additionally the step of completing a form indicating suspicious circumstances if a customer purchased a plurality of previous financial transactions with a regular frequency is not taught, disclosed, anticipated by Justice, as paragraph [0121] discloses only that “reports are generated listing all detected past transactions containing the identified *fraud indicator*” (emphasis added). Paragraph 121 discloses only reports containing a fraud indicator, and therefore does not anticipate, suggest or teach completing a form indicating suspicious circumstances if a customer worked with a second customer to purchase a dollar amount of a plurality of previous financial transactions in a manner intended to result in a total dollar value less than a threshold amount. Therefore as neither Justice nor Buchanan, alone or in combination, suggest, teach, or disclose the Applicants’ Claims 12-13, the rejection under §103(a) has been overcome, and the Applicants respectfully assert that Claims 12-13 is in condition for allowance.

As to Claim 14, Justice discloses only whether a call is being placed from a “predefined

high risk area,” not whether a plurality of images indicate multiple financial transactions originated from different post offices in a geographic area. As neither Justice nor Buchanan, alone or in combination, suggest, teach, or disclose the Applicants’ Claim 14, the rejection under §103(a) has been overcome, and the Applicants respectfully assert that Claim 14 is in condition for allowance.

Claims 16-17

As to Claims 16 and 17, Buchanan discloses at [0175] only the fact that optical character recognition can be used on forms such as checks, not whether a plurality of images bear no payees or endorers. Paragraph [0235] also fails to disclose determining whether a plurality of images bear no payees or endorers; instead, this section of the publication addresses sending check data to an appropriate processing entity such as the Federal Reserve Board. Paragraph [0258] recites a variety of reports formats that could be generated, but respectfully, nowhere does the Buchanan reference disclose a step in determining whether a plurality of images bear no payees (claim 16) or bear no endorers (claim 17). As neither Justice nor Buchanan, alone or in combination, suggest, teach, or disclose the Applicants’ Claims 16 and 17, the rejection under §103(a) has been overcome, and the Applicants respectfully assert that Claims 16 and 18 are in condition for allowance.

7. Claim 15 stands rejected under 35 U.S.C. § 103(a), as being unpatentable over U.S. Patent Application Publication No. 2003/0174823 A1 (Justice et al.), in view of U.S. Patent Application Publication No. 2002/0138417 A1 (Buchanan et al.). The Applicants have cancelled Claim 15 without regard to prejudice or disclaimer.

CONCLUSION

Applicants submit that the above amendments and remarks place the pending claims in a condition for allowance. Therefore, a Notice of Allowance is respectfully requested.

Respectfully submitted,



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